



THE CITY OF NEW YORK
LAW DEPARTMENT

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

100 CHURCH STREET
NEW YORK, NY 10007

James M. Sheehan
Assistant Corporation Counsel
Phone: (212) 356-2105
jashecha@law.nyc.gov

February 13, 2023

BY ECF

Honorable Alvin K. Hellerstein
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Phillip Jacobs v. City of New York, et al.,
22-CV-05723 (AKH)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York. I write pursuant to Rule 1.4 of the Local Civil Rules of the United States District Courts for the Southern and Eastern Districts of New York to request that the Court issue an Order substituting the undersigned as counsel of record on behalf of defendants City of New York ("City"), New York City Police Department, and Alfred Maldonado in place of former Senior Counsel Erica Bianco. Simultaneously herewith, I am filing a notice of substitution of counsel and a Declaration of Erica Bianco in support of this motion.

Defendants thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/ James M. Sheehan
James M. Sheehan
Assistant Corporation Counsel
Special Federal Litigation Division

cc: **VIA ECF**
Steven Goldman
Attorney for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PHILLIP JACOBS,

Plaintiff,

- against -

THE CITY OF NEW YORK; NEW YORK CITY POLICE
DEPARTMENT; P.O. ALFRED MALDONADO, SHIELD #
7409, 44 PRECINCT, POLICE OFFICERS JOHN DOE 1-10,
SHIELD NUMBERS UNKNOWN,

Defendants.

x

**NOTICE OF SUBSTITUTION
OF COUNSEL**

22-CV-05723 (AKH)

x

PLEASE TAKE NOTICE that the following attorney is hereby substituted in place of Erica Bianco, as counsel of record on behalf of the Corporation Counsel of the City of New York, Honorable Sylvia O. Hinds-Radix, attorney for defendants City of New York ("City"), the New York City Police Department, and Alfred Maldonado.

James M. Sheehan
Assistant Corporation Counsel
New York City Law Department
100 Church Street
New York, New York 10007
(212) 356-2105
jasheeha@law.nyc.gov

From this date forward, please serve all pleadings on the attorney set forth above, and please remove Erica Bianco as counsel of record.

Dated: New York, New York
February 13, 2023

HON. SYLVIA O. HINDS-RADIX
CORPORATION COUNSEL OF THE CITY OF NEW YORK
*Attorney for Defendants City of New York, the New York City Police
Department, and Alfred Maldonado*
100 Church Street
New York, New York 10007
(212) 356-2386

/s/ James M. Sheehan
James M. Sheehan
Assistant Corporation Counsel
Special Federal Litigation Division

cc: **VIA ECF**
Steven Goldman, Esq.
Attorney for Plaintiff

DECLARATION

I, ERICA BIANCO, declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an Assistant Corporation Counsel at the New York City Law Department and, on behalf of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, I am counsel of record in this action.

2. The representation of City Defendants in this matter has been transferred to another Assistant Corporation Counsel at the New York City Law Department, who is filing a Notice of Substitution of Counsel along with this declaration. My last day working for the New York City Law Department will be February 10, 2023. After that date, I will have no involvement in this matter whatsoever.

3. Please terminate me from the docket sheet as counsel of record and replace me with the attorney whose name and information appears on the attached Notice of Substitution of Counsel.

Dated: New York, New York

February 3, 2023

Erica Bianco

ERICA BIANCO